

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
1:23-cv-01072-JMF**

Evgeny RYZHOV

Plaintiff

-v-

\$5,379,876.94 at Sunflower Bank, NA et al

Defendants

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**AFFIDAVIT IN SUPPORT OF REQUEST
FOR ENTRY OF DEFAULT**

Evgeny RYZHOV, being duly sworn, deposes and says:

1. I am the Plaintiff in this action, and, as such, I am fully familiar with the facts and circumstances of this action.
2. I submit this Affidavit in support of my Plaintiff's Request for a Clerk's Certificate of Entry of Default.
3. On February 07, 2023, this action was commenced by me, Evgeny RYZHOV, against \$5,379,876.94 at Sunflower Bank, Konstantin MALOFEYEV, and TSARGRAD TV. [ECF No.1], further amended as TSARGRAD MEDIA [ECF No. 48]
4. On November 20, 2023, the Court issued an Order allowing to effectuate service of process by alternative means [ECF No.53].
5. On December 1, 2023, the Summons was issued as to TSARGRAD MEDIA [ECF No.54].
6. In compliance with the Court's Memorandum Opinion and Order dated November 20, 2023 [ECF No. 53], I served Tsargrad Media with the originals and Russian translations of the Second Amended Complaint [ECF No. 48], Memorandum Opinion and Order [ECF No. 53] and Summons [ECF No.54], as follows:
 - a. On December 10, 2023:
 - i. By posting the said documents on my VK account;
 - ii. By sending the said documents via direct messages to Tsargrad Media's VK and Facebook accounts;
 - iii. By sending the said documents via a direct message to Elena Sharoykina's Facebook account;

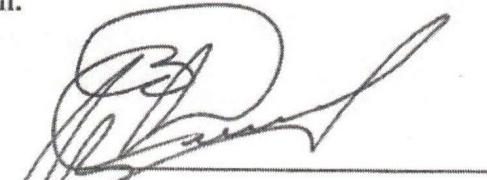
iv. By emailing the said documents to tsargradtv@gmail.com, info@tsargrad.tv, press@tsargrad.tv, and reference@tsargrad.tv.

b. On December 12, 2023:

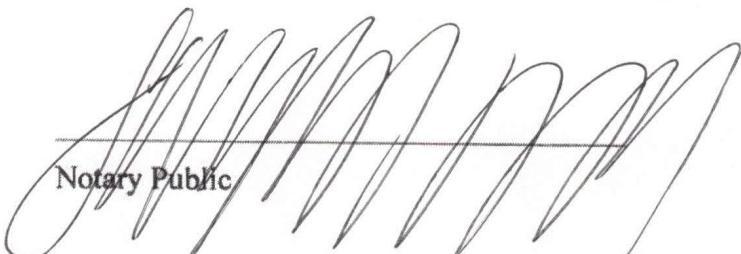
v. By mailing the said documents at 115093, Moscow, Partiyny Lane, 1, B.57, P.3, Floor 1, Premises I, Room 45, with tracking number 60308290003186. According to Global Parcel Tracking, <https://parcelsapp.com/en>, the said documents were received by TSARGRAD MEDIA on December 18, 2023, at 15:13 (Moscow Time).

7. On December 22, 2023, I filed a Certificate of Service confirming the successful completion of the service of process, and therefore, the last possible day to answer for TSARGRAD MEDIA was due on January 12, 2024. [ECF 21]
8. Defendant TSARGRAD MEDIA has failed to appear, plead, or otherwise defend the claims against it within the time allowed and, therefore, is now in default.
9. Defendant TSARGRAD MEDIA is an entity and is not in the military service.
10. Defendant TSARGRAD MEDIA is not an infant or incompetent person.
11. I, Plaintiff Evgeny RYZHOV, request that the Clerk of the Court enter that Defendant TSARGRAD MEDIA has defaulted in this action.

Dated January 18, 2024


Evgeny RYZHOV

Sworn to and subscribed before me this 18th day of January 2024


Notary Public